

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

Case No. 15-MJ-490

Melissa McGhie)

FILED)

APR 21 2015)

Defendant(s)

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.
On or about the date(s) of April 20, 2015 in the county of Philadelphia, in the Eastern District of Pennsylvania, the
defendant violated:

Code Section

18 U.S.C. § 371

18 U.S.C. § 1341

18 U.S.C. § 1028A

Offense Description

Conspiracy

Mail fraud

Aggravated identity theft

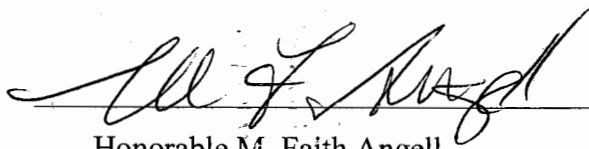
This criminal complaint is based on these facts:

See Attached Affidavit
Adaniel E. Zoga

United States Postal Inspector

Sworn to before me and signed in my presence.

Date: April 20, 2015


Honorable M. Faith Angell

City and state: Philadelphia, Pennsylvania

FILED

APR 21 2015

AFFIDAVIT

I, Adaniel E. Zoga, having been duly sworn and deposed, state that: ADANIEL E. KUNZ, Clerk
by Dep. Clerk

1. Your affiant, Adaniel E. Zoga, is a United States Postal Inspector and has been employed as such for under two years. Your affiant is presently assigned to the Identity Theft Task Force Team of the Philadelphia Division and, in this capacity, has conducted and participated in hundreds of identity theft investigations.
2. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, review of documents, knowledge obtained from other individuals including other law enforcement personnel, and communications with others who have personal knowledge of the events and circumstances described herein. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant of Melissa MCGHIE, this affidavit does not set forth each and every fact learned by me or other agents during the course of this investigation.
3. This investigation involves the theft of personal identifier information and the subsequent use of this information to contact credit card issuers to compromise and fraudulently charge transactions to existing credit card accounts without the knowledge or permission of the true victim accountholder.
4. Co-conspirator 1, a person whose identity is known to me but redacted here, was the leader of this "account takeover" fraud scheme. Co-conspirator 1, along with co-conspirators, obtained personal identifier information by placing telephone calls to unsuspecting victims, most of whom were elderly. Through different ruses such as posing as a bank representative, Co-conspirator 1 obtained victims' bank account information and personal identifiers. Co-conspirator 1, along with co-conspirators, next contacted the credit card issuer. Co-conspirator 1 and co-conspirators now posing as the accountholder, added another name as an authorized user. A fraudulently requested credit card would subsequently be mailed, often through Federal Express ("Fed Ex"). Co-conspirator 1 orchestrated its use in transactions to purchase merchandise.
5. Co-conspirator 1 recruited other individuals, including Melissa MCGHIE, to purchase items with the fraudulent credit card accounts.
6. Co-conspirator 1 was previously prosecuted in the Eastern District of Pennsylvania for a similar scheme. Co-conspirator 1 pled guilty to conspiracy, mail fraud, aggravated identity theft, and access devise fraud. The district court sentenced him to 77 months' imprisonment. Co-conspirator 1 is currently on supervised release.

MCGHIE Fraudulently Used S.B.'s Credit Card Account

7. On or about December 8, 2014, the conspirators fraudulently added the name Melissa McGhee, a misspelling, as an authorized user of S.B., a 76-year old's, Discover credit card account ending in -5287, without S.B.'s knowledge and consent.
8. From on or about December 8, 2014 to on or about January 14, 2015, MCGHIE made fraudulent charges using S.B.'s Discover credit card account in the total amount of approximately \$21,720. MCGHIE purchased items from Lowe's, The Home Depot, IKEA, Best Buy, Rite Aid, Victoria's Secret, Hertz, WaWa, Macy's, Wal-Mart, Toys R Us, etc. using S.B.'s Discover credit card.


MCGHEE Fraudulently Used M.Jo.'s Credit Card Account

9. On or about November 5, 2014, the conspirators fraudulently added the name Mellissa McGhee, a misspelling, as an authorized user of 75-year old victim, M.Jo.'s, Chase credit card account ending in -3486, without her knowledge and consent.
10. On or about November 6, 2014 to on or about December 8, 2014, MCGHIE made fraudulent charges using M.Jo.'s Chase credit card in the total amount of \$26,023. MCGHIE purchased items from Bloomingdales, Neiman Marcus, Rite Aid, Apple Store, H&M, Louis Vutton, Gucci, Lord & Taylor, Avis Rent-a-Car, Hertz Rent-a-Car, etc.

MCGHIE Fraudulently Used M.Ja.'s Credit Card Account

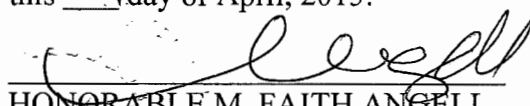
11. On or about April 17, 2015, the conspirators fraudulently added the name Melissa McGhee, a misspelling, as an authorized user of victim, M.Ja.'s Citizens Bank credit card account ending in -5397, without M.Ja.'s knowledge and consent. Citizens Bank mailed a credit card in the name of Melissa McGhee via Fed Ex to victim M.Ja.'s address in Philadelphia, PA.
12. On or about April 20, 2015, MCGHIE signed for a Fed Ex package sent to M.Ja.'s address. Inside the package was the credit card in the name of Melissa McGhee using M.Ja.'s account.

13. On or about April 20, 2015, MCGHIE made fraudulent charges using M.Ja.'s credit card account in the total amount of approximately \$2,844.80. MCGHIE purchased items from Saks Fifth Avenue. MCGHIE also attempted to purchase items in the amount of \$750 at Home Depot.
14. On or about April 20, 2015, MCGHIE was stopped at Adams Avenue and Whitaker Avenue, Philadelphia, PA, by the United States Postal Inspectors, including your affiant. MCGHIE was the passenger in the red Dodge Charger, Tag No. JPX-3899, driven by Co-conspirator 1.
15. MCGHIE was taken into custody by United State Postal Inspectors and transported to their office at 333 E. City Avenue, Philadelphia, PA. MCGHIE read and executed an Advice of Rights form, and described her involvement with in the credit card scheme. MCGHIE stated that she used a fraudulently issued credit card to purchase several items with the credit card at Saks Fifth Avenue in Bala Cynwyd, PA.
16. MCGHIE gave United States Postal Inspectors consent to search her purse, which contained a Citizens credit card in the name of Melissa McGhee and a letter from Citizens Bank addressed to M.Ja.
17. Based on the above facts, your affiant avers that there is probable cause to believe that defendant MELISSA MCGHIE committed conspiracy, in violation of Title 18, United States Code, Section 371; mail fraud, in violation of Title 18, United States Code, Section 1341; and aggravated identity theft, in violation of Title 18, United States Code, Section 1028A.



Adaniel E. Zoga
United States Postal Inspector

Sworn to and subscribed before me
this 21 day of April, 2015:



HONORABLE M. FAITH ANGELL
United States Magistrate Judge